

July 28, 2003

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Mr. Jorge Arroyo, Washington , DC, jarroyo@comdt.uscg.mil

RE: Docket #USCG-2003-14878  
Automatic Identification System, Vessel Carriage Requirement

To Whom it May Concern:

We are opposed to the requirement that commercial fishing vessels 65 feet in length and longer be required to carry an Automatic Identification System (AIS) in vessel traffic control areas or, should the requirement be extended, in any other areas. The commercial fleet in this region has been working closely with the coast guard in matters of national security and we cannot see how an AIS will enhance communication that is already taking place on the radio and with other electronic tracking systems. Implementation of this requirement will result in unnecessary expense to an industry that is already severely taxed by several reporting and observer coverage regulations.

The larger boats in the Mid-Atlantic and New England commercial fleets already carry BoatTracs or another Vessel Monitoring System (VMS.) These systems, in conjunction with broad-band radio channels currently used by the Coast Guard to communicate with these vessels, enable authorities to pinpoint their location, direction and activities at virtually any time. According to Coast Guard Public Affairs Release No. 148-03, the AIS will "allow ships to easily track, identify and exchange pertinent navigation information from one another or ashore; for collision avoidance, security and VTS reporting." While the addition of those functions may be necessary for some of the vessels on your list, they are already in operation for the commercial fishing boats in the conduct of their business.

For the most part, the commercial fishing fleet does not harvest resource or offload in vessel traffic areas or restricted harbors. While they may need to transit vessel traffic control areas to perform maintenance tasks, it is rare that they are in waters that must be monitored. Shipping lanes are not compatible with fishing gear deployment and are avoided for that reason.

The addition of a \$9000.00 system, uninstalled, is a considerable burden to place on commercial fishers to duplicate capabilities they already have. Many of these boats installed VMS only recently to comply with closed-area regulations for a specific fishery. Others must carry and pay for observers from the National Marine Fisheries Service in addition to upgrading their electronic reporting systems.

This country's offshore fishing fleet is its first line of observation and reporting at sea. We are attentive of ways to contribute to America's Homeland Security and respectful of the need for reliable and clear communications on the water. With all due consideration for continued cooperative relations between

commercial fishermen and the United State Coast Guard, we ask to be exempted from the AIS requirements of the above-captioned Docket.

Thank you for your consideration,

Sima Freierman, General Manager  
Montauk Inlet Seafood Inc  
PO Box 2148, Montauk, NY 11954  
ph 631.668.3419 fax 631.668.1225